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13 Attorneys for Plaintiffs DORA SOLARES
14 [Counsel for Defendants on signature page]

15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**

17 DORA SOLARES,

18 Plaintiff,

19 v.

20 RALPH DIAZ, in his individual
21 capacity, KENNETH CLARK, in his
22 individual capacity, JOSEPH BURNS,
23 in his individual, and DOES 1 TO 15, in
24 their individual capacities

25 Defendants.

Case No. 1:20-cv-00323-LHR-BAM

**STIPULATED AMENDED
SCHEDULING AND DOCKET
CONTROL ORDER; AND ORDER
THEREON**

Hon. Lee H. Rosenthal

26
27 **COME NOW** Plaintiff Dora Solares and Defendants Burnes, Gallemore,
28 Gamboa, Garcia, Loza, Maytubby, Munoz, and Pena and Defendant Silva hereby

1 stipulate and submit the following proposed amended schedule to control the above-
2 listed matter:

3
4
5
6 1. June 20, 2025

**COMPLETION OF NON-EXPERT
DISCOVERY**

7
8 Written discovery requests are not
9 timely if they are filed so close to this
10 deadline that under the Federal Rules
11 of Civil Procedure the response would
12 not be due until after the deadline.

13 2. June 30, 2025

**EXPERTS ON MATTERS OTHER
THAN ATTORNEYS' FEES**

14 The plaintiff (or the party with the
15 burden of proof on an issue) will
16 designate expert witnesses in writing
17 and provide the report required by Rule
18 26(a)(2) of the Federal Rules of Civil
19 Procedure.

20 3. July 30, 2025

OPPOSING EXPERTS

21 The opposing party will designate
22 expert witnesses in writing and provide
23 the report required by Rule 26(a)(2) of
24 the Federal Rules of Civil Procedure.

25 4. August 22, 2025

CLOSE OF EXPERT DISCOVERY

26 5. September 5, 2025

**PRETRIAL DISPOSITIVE
MOTIONS DEADLINE**

27 No motion may be filed after this date
28 except for good cause.

6. October 30, 2025

**JOINT PRETRIAL ORDER AND
MOTION IN LIMINE DEADLINE**

The Joint Pretrial Order will contain the pretrial disclosures required by Rule 26(a)(3) of the Federal Rules of Civil Procedure. Plaintiff is responsible for timely filing the complete Joint Pretrial Order. Failure to file a Joint Pretrial Order timely may lead to dismissal or other sanction in accordance with the applicable rules.

7. November 14, 2025

DOCKET CALL

Docket Call will be held at 2:00 p.m. in a location to be determined. No documents filed within 7 days of the Docket Call will be considered. Pending motions may be ruled on at docket call, and the case will be set for trial as close to the docket call as practicable.

Any party wishing to make any discovery motions should arrange for a pre-motion conference with the court before the preparation and submission of any motion papers. That includes a motion to compel, to quash, or for protection. Email Ms. Hassan at Glenda_Hassan@txs.uscourts.gov or fax her at 713-250-5213 to arrange for a pre-motion conference. Notify your adversary of the date and time for the conference.

Respectfully submitted,

Dated: March 31, 2025

LAW OFFICES OF ERIN DARLING

By: /s/Erin Darling

Erin Darling,

Attorneys for Plaintiff Dora Solares

Dated: March 31, 2025

Respectfully submitted,

ROB BONTA

Attorney General of California

JON S. ALLIN

Supervising Deputy Attorney General

/s/Jeremy Duggan (as authorized on 3/31/25)

JEREMY DUGGAN

Deputy Attorney General

Attorneys for Defendants

Burnes, Gallemore, Gamboa, Garcia, Maytubby, Munoz, Loza, and Pena

Dated: March 31, 2025

ANDRADA & ASSOCIATES

/s/ Lynne G. Stocker (as authorized on 3/31/25)

By: Lynne G. Stocker

Attorneys for defendant SILVA

Dated: April 4th, 2025



LEE H. ROSENTHAL
UNITED STATES DISTRICT JUDGE